

UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF ILLINOIS

**TONY COLLINS, NAIMATULLAH
NYAZEE and ANN MURRAY**, for
themselves and all others similarly situated,

Plaintiffs,

v.

NPC INTERNATIONAL, INC.,

Defendant.

CASE NO. 3:17-cv-00312-NJR-RJD

**PLAINTIFFS' UNOPPOSED MOTION FOR
EXTENSION OF TIME TO FILE AMENDED COMPLAINT**

Plaintiffs Tony Collins, Naimatullah Nyazee, and Ann Murray (collectively, "Plaintiffs"), respectfully move the Court for an extension of time to file their Motion for Leave to File an Amended Complaint from July 18, 2019 to August 1, 2019. In support of this motion, Plaintiffs state as follows:

1. On June 19, 2019, the Court granted Plaintiffs' Motion to Lift Stay and instructed Plaintiffs to move for leave to file an amended complaint by July 18, 2019.
2. Plaintiffs have since been contacted by an attorney representing delivery driver employees who are putative class members in this litigation.
3. Plaintiffs request this two-week extension so as to coordinate with these class members and their attorney and, in doing so, limit or avoid further requests to amend the complaint.
4. Counsel for Plaintiffs has conferred with counsel for Defendant, and Defendant has no objection to this request.

5. This is the first request for an extension of this deadline. This extension is not sought for delay or any other improper purpose, but simply to avoid unnecessary or duplicative filings before the Court.

WHEREFORE, Plaintiffs respectfully request an extension of up to fourteen days, up and including August 1, 2019, in which to submit a motion for leave to file an amended complaint.

Dated: July 15, 2019

Respectfully submitted,

**FINKELSTEIN, BLANKINSHIP,
FREI-PEARSON & GARBER, LLP**

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